

EXHIBIT “H”



E. STEWART
Jones Hacker Murphy LLP
ATTORNEYS & COUNSELORS AT LAW

Please send all mail to:
TROY OFFICE

28 SECOND STREET
TROY, NY 12180
PHONE: (518) 274-5820

200 HARBORSIDE DRIVE, SUITE 300
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511 BROADWAY
SARATOGA SPRINGS, NY 12866
PHONE: (518) 584-8886

1659 CENTRAL AVENUE, SUITE 103
ALBANY, NY 12205
PHONE: (518) 486-8800

FAX: (518) 274-5875

May 18, 2021

VIA U.S. MAIL & E-MAIL TO:

chet@chetminingco.com

Chet Stojanovich
105 Duane Street, Apt. 20F
New York, New York 10007

RE: Alex Holmes, et al. v. Chet Stojanovich, et al. Case No.: 7:20cv04448 and
Andrew Schwartzberg v. Chet Stjanovich, et al. Case No.: 1:20cv01880 www.joneshacker.com

Dear Chet:

Enclosed please find a revised Article 52 subpoena with regard to the above referenced matters. Your deposition is scheduled for June 10, 2021 at 1:00 P.M. (EST) via Zoom conferencing. The link for the Zoom deposition is as follows:

<https://us04web.zoom.us/j/79674118120?pwd=Kzhxekw5NGpBTXZhV3ZlYnluK25LZz09>

Meeting ID: 796 7411 8120

Passcode: 814Vc6

Please be advised that if you fail to appear at this deposition, we will make a motion to hold you in contempt of Court.

Pursuant to the enclosed subpoena, please provide my offices with electronic copies of documents in your possession, custody or control at least 10-days before the date for your deposition.

Very truly yours,

E. STEWART JONES HACKER MURPHY LLP

/s/ John F. Harwick

John F. Harwick, Esq.

jharwick@joneshacker.com

Direct Dial: (518) 213-0113

JFH:dmd

Enclosure

AO 88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

ALEX HOLMES, ET AL.

Plaintiff

v.

CHET MINING CO, LLC, CHET MINING CO
CANADA LTD and CHET STOJANOVICH*Defendant*

Civil Action No. 7:20-CV-0448-UA

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: CHET MINING CO., LLC, CHET MINING CO CANADA LTD and CHET STOJANOVICH

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: <https://us04web.zoom.us/j/796741181207>
 pwd=Kzhxekw5NGpBTXZhV3Z1YnluK25LZz09
 Meeting ID: 796 7411 8120 Passcode: 814Vc6

Date and Time: Adjourned to
 06/10/2021 1:00 pm

The deposition will be recorded by this method: Stenographer and video

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Exhibit "A" attached hereto. Kindly provide all documents requested two (2) weeks prior to deposition via e-mail to jharwick@joneshacker.com.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/19/2021

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* John F. Harwick,
 Representing all Plaintiffs, who issues or requests this subpoena, are:

E. Stewart Jones Hacker Murphy LLP, 28 Second Street, Troy NY 12180, jharwick@joneshacker.com, (518) 213-0113

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Exhibit A

Produce the following items relating to Chet Mining Co., LLC, Chet Mining Co Canada

LTD and Chet Stojanovich (collectively the "Debtors") for the past six (6) years:

1. All documents showing loans to others;
2. General ledger and checkbooks;
3. Federal and State Income Tax Returns, including all schedules and amendments;
4. Bank account statements (e.g., cash accounts, checking accounts, savings accounts);
5. Certificates of deposit;
6. Balance sheets;
7. A list of assets and/or inventory owned or leased ;
8. Any documents showing monies owed to the Debtors;
9. A list of all accounts receivable, with the debtor's addresses;
10. Documents showing any transactions with insiders (e.g. employees, shareholders, members, owners, officers or directors of the Debtors);
11. Financial statements;
12. Deeds to any and all real property owned or controlled;
13. Documents showing ownership, leasing or control of any real property, equipment, boat, aircraft or vehicles;
14. Appraisals of any real or personal property owned;
15. Loan and/or line of credit applications;
16. All audited or unaudited financial statements and disclosures;
17. Audit reports;
18. UCC filings and financing statutes;
19. Payroll account records;
20. Shareholder agreements;
21. Operating agreements of any LLC owned or operated by Debtors;
22. LLC or Corporate minutes, books and records;
23. Insurance policies;
24. Titles to any and all vehicles, boats, aircrafts and/or equipment;
25. Wills;
26. Trusts where the Debtors are beneficiaries or grantors;
27. Retirement account statements;
28. Investment accounts statements;
29. Securities certificates;
30. Stock options;
31. Commodity account statements;
32. Broker margin account statements;
33. Written itemization of all cash and crypto currency held by or on behalf of the Debtors;
34. Safe deposit box records and the contents of safe deposit boxes;
35. Credit card statements and applications;
36. Loan applications;

37. Mortgages, mortgage statements and applications;
38. Loan and line of credit documents and written statements;
39. A statement of net worth;
40. Divorce proceeding records;
41. Contingent interests (*e.g.*, stock options, interests subject to life estates, prospective inheritances);
42. Tax shelter investment records;
43. Debt collection records;
44. Judgments;
45. Pleadings in all lawsuits where the Debtor is a party;
46. Arbitration papers and awards where the Debtor is a party;
47. Documents showing ownership of patents;
48. Documents showing ownership of trademarks;
49. Documents showing ownership of copyrights;
50. Documents showing ownership of intellectual property;
51. Any evidence of gifts to others;
52. All cryptocurrency records/statements;
53. Software and hardware wallets;
54. Warm and cold storage units;
55. Information and statements for all cryptocurrency exchange, brokerage and investments accounts;
56. All mobile devices including phone and/or tablets;
57. All cryptocurrency information contained on servers, computers and laptops;
58. All cloud and edge computing accounting data related to cryptocurrency;
59. All cryptocurrency account information such as Kraken, Coinbase, Gemini, et al;
60. All Keystone files and crypto wallet passphrases; and
61. Any other information, documents or electronic data showing ownership or control of any cryptocurrency.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT COURT

ALEX HOLMES, et al.,

Plaintiffs,

-against-

AFFIDAVIT OF SERVICE

Case No.: 7:20-cv-0448-UA

CHET MINING CO., LLC, et al.

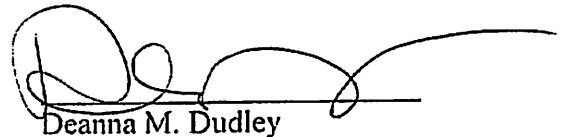
Defendants.

STATE OF NEW YORK)
)ss:
COUNTY OF SCHENECTADY)

Deanna M. Dudley, being duly sworn, deposes and says that she is over the age of 18 years and is not a party to this action; on the 18th day of May 2021, she served the within **LETTER ENCLOSING ARTICLE 52 SUBPOENA** upon the following:

TO: **CHET STOJANOVICH**
 105 Duane Street, Apt. 20F
 New York, NY 10007
 chet@chetminingco.com

by depositing a true and correct copy of the same via e-mail and properly enclosed in a post-paid wrapper in the Post Office maintained and exclusively controlled by the United States at Schenectady, New York directed to said individual and/or attorney(s), respectively, at said address(es), mentioned above, that being the address(es) within the state designated for that purpose upon the last papers served in this action or the place where the above then resided or kept offices, according to the best information which can be conveniently obtained.


Deanna M. Dudley

Sworn to before me this
18th day of May 2021.


Notary Public - State of New York

STEPHANIE HARRIS
Notary Public, State of New York
Qualified in Schenectady County
No.: 01LO6083461
Commission Expires on 11/12/22